

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC
PARTICIPATION, MARY WINTER, GENE
STEINBERG, NANCY HART, SARAH
WOLFF, KAREN SLAVEN, KATE KENNEDY,
EDA DANIEL, and ANDREA SFERES,

Plaintiffs,

-and-

People of the STATE OF NEW YORK, by its
attorney general, LETITIA JAMES, ATTORNEY
GENERAL OF THE STATE OF NEW YORK

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN, J.M.
BURKMAN & ASSOCIATES, LLC, PROJECT
1599, and JOHN and JANE DOES 1-10,

Defendants.

Civil Action No. 20-cv-8668

**NOTICE OF PLAINTIFFS' MOTION *IN LIMINE* TO EXCLUDE EVIDENCE OF THE
SUBJECT MATTER OF PLAINTIFF'S PRIOR CONVICTION**

For the reasons set forth in Plaintiffs' accompanying Memorandum of Law, and based on the Declaration of Amy Walsh in support of Plaintiffs' motions *in limine*, together with attached exhibits, and the record and pleadings on file in this case, Plaintiffs respectfully ask the Court to exclude from trial evidence about the subject matter of Plaintiff Gene Steinberg's prior conviction.

Dated: New York, New York
June 22, 2023

Respectfully submitted,

LETITIA JAMES

*Attorney General
State of New York*

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